

1 Dean Gazzo Roistacher LLP
2 Lee H. Roistacher, Esq. (SBN 179619)
3 440 Stevens Avenue, Suite 100
4 Solana Beach, CA 92075
5 Telephone: (858) 380-4683
6 Facsimile: (858) 492-0486
7 E-mail: lroistacher@deangazzo.com

5 Attorneys for Defendants
6 State of California by and through California
Highway Patrol and Officer Ramon Silva

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

10 SANDRA KIRKMAN AND
11 CARLOS ALANIZ,
12 INDIVIDUALLY AND AS
SUCCESSORS-IN-INTEREST TO
JOHN ALANIZ, DECEASED.

13 || Plaintiff,

14 || V.

15 STATE OF CALIFORNIA;
16 RAMON SILVA; AND DOES 1-10,
INCLUSIVE.

17 ||| Defendant.

Case No.: 2:23-cv-07532-DMG-SSC

**DEFENDANTS STATE OF
CALIFORNIA BY AND THROUGH
CALIFORNIA HIGHWAY PATROL
AND OFFICER RAMON SILVA'S
NOTICE OF MOTION AND
MOTION IN LIMINE TO EXCLUDE
GRUESOME POST-INCIDENT AND
POST-MORTEM PHOTOGRAPHS**

[No. 2 of 4]

Courtroom: 8C
Judge: Hon. Dolly M. Gee

FPTC: March 25, 2025, 2:00 p.m.

Trial Date: April 15, 2025, 8:30 a.m.

21 TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF
22 RECORD:

23 **PLEASE TAKE NOTICE** that defendants State of California by and
24 through California Highway Patrol and Officer Ramon Silva will move this Court
25 in limine for an order excluding gruesome post-incident and post-mortem
26 photographs depicting the decedent and his injuries. This motion is brought under
27 Federal Rules of Evidence 401-43 and is based upon this notice, the memorandum
28 of points and authorities, the pleadings, papers, and records on file herein, and such

1 other evidence and/or argument as the Court may accept at or prior to the hearing
2 on this motion.

3

4 Dated: March 14, 2025

Dean Gazzo Roistacher LLP

5

6

By: /s/ Lee H. Roistacher

7

Lee H. Roistacher

8

Attorneys for Defendants

9

State of California by and through

10

California Highway Patrol and

11

Officer Ramon Silva

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28